

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                       |   |                         |
|-----------------------|---|-------------------------|
| IN RE:                | : | Chapter 13              |
| James Michael Stritch | : |                         |
| Debtor(s)             | : | Bankruptcy No. 20-10313 |
|                       | : |                         |
|                       | : |                         |

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

The debtor(s), James Michael Stritch, has/have filed a Motion to Avoid Judgment Lien of Marple Fleet Leasing, LLC with the court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case/adversarial proceeding. (If you do not have an attorney, you may wish to consult one.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before January 19, 2021 you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
For the Eastern District of Pennsylvania  
Robert C. Nix Building  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the Bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Anthony A. Frigo  
The Law Offices of Anthony A. Frigo  
Suite 230  
175 Strafford Ave., Suite One  
Wayne, PA 19087  
(610) 687-7784

1. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

2. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman on January 21, 2021 at 10:30 AM in Courtroom #2, United States Bankruptcy Court, Robert C. Nix Sr. Building, 900 Market Street, Philadelphia, PA 19107.

3. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

4. You may contact the Bankruptcy Court Office at (215) 408-2800 to find out if the hearing has been cancelled because no one filed an answer.

Date: December 30, 2020

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|                       | : |                         |

**CERTIFICATE OF SERVICE**

The undersigned, Anthony A. Frigo, hereby certifies that a true and correct copy of the Amended Notice of Motion, Response of Deadline, and Hearing Date has been served this 30<sup>th</sup> day of December 2020 upon those on the attached list and all interested parties by electronic means or by United First Class Mail, postage prepaid.

Dated: December 30, 2020

/S/ Anthony A. Frigo

Anthony A. Frigo, Esquire  
175 Strafford Ave., Suite One  
Wayne, PA 19087  
[Anthonyfrigo@msn.com](mailto:Anthonyfrigo@msn.com)  
(O) (610) 687-7784

All Creditors

Marple Fleet Leasing, LLC  
c/o Joseph Pacifico, President  
3015 West Chester Like  
Broomall, PA 19008

Anthony A. Frigo  
175 Strafford Ave., Suite One  
Wayne, PA 19087

James Michael Stritch  
120 Bryn Mawr Ave.  
Newtown Square, PA 19073

U.S. Trustee